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 2 Acting under Authority Conferred by 28 U.S.C. § 515

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11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA, ) CASE NO. 3:24-cr-00329 CRB

15 Plaintiff, ) MOTION TO SEAL DOCUMENTS

16 v. )

17 RUTHIA HE, A/K/A RUJIA HE, and DAVID ) UNDER SEAL  
 18 BRODY, )

19 Defendants. )

**FILED**

Jun 12 2024

Mark B. Busby  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO

21 The United States hereby moves the Court for an Order sealing this Motion, the concurrently-  
 22 filed Indictment, the Arrest Warrants, the Sealing Order, and all other related documents in the above-  
 23 captioned case until further Order of the Court. The United States further moves the Court to Order that  
 24 each of the aforementioned documents remain sealed until execution of the arrest warrants.

25 The reason for this request is that disclosure of the existence of the Indictment or Arrest  
 26 Warrants could compromise the safety of law enforcement agents in the execution of the Arrest  
 27 Warrants. In addition, the requested sealing is reasonably necessary to protect against the potential  
 28 destruction of evidence and to prevent the possible flight of the defendants.

The United States also requests that, notwithstanding any sealing order, the Clerk of Court be required to give copies of the sealed documents to employees of the United States Attorney's Office and/or Special Agents of the Drug Enforcement Administration and Homeland Security Investigations. In addition, the United States requests that the United States Attorney's Office be permitted to serve working copies on federally-deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, to effectuate the Court's Orders.

DATED: June 12, 2024

Respectfully submitted,

MATTHEW M. YELOVICH  
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Acting under Authority Conferred  
by 28 U.S.C. § 515

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/s/  
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